

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

IN RE: ETHICON, INC.,  
PELVIC REPAIR SYSTEMS  
PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

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THIS DOCUMENT RELATES TO THE CIVIL ACTION NOS. LISTED ON THE ATTACHED EXHIBIT:

**JOINT MOTION TO DISMISS DEFENDANT  
AMERICAN MEDICAL SYSTEMS, INC. WITH PREJUDICE**

Plaintiffs in the cases listed on the attached Exhibit A and defendant American Medical Systems, Inc. ("AMS") advise the Court that they have compromised and settled all claims between them in these actions, including all counterclaims, cross-claims and third party claims. Accordingly, Plaintiffs and AMS jointly move the court to dismiss AMS as a defendant in these actions with prejudice, and terminate AMS from the docket in these actions, parties to bear their own costs. Other defendants remain in these actions, and plaintiffs will continue to pursue these actions against them.

Respectfully:

/s/ Barbara R. Binis  
Barbara R. Binis  
REED SMITH  
Three Logan Square, Suite 3100  
1717 Arch Street  
Philadelphia, PA 19103  
215.851.8100 (phone)  
215.851.1420 (fax)  
bbinis@reedsmith.com

/s/ Erik W. Legg  
Erik W. Legg  
FARRELL WHITE & LEGG  
P. O. Box 6457  
Huntington, WV 25772-6457  
304.522.9100 (phone)  
304.522.9162 (fax)  
EWL@farrell3.com

*Attorneys for Defendant American Medical Systems, Inc.*

/s/ Derek H. Potts

Derek H. Potts

THE POTTS LAW FIRM

Suite 350

100 Waugh Drive

Houston, TX 77007

713.963.8881 (phone)

713.583.5388 (fax)

Email: dpotts@potts-law.com

*Attorney for Plaintiffs on Exhibit A*

Dated: April 18, 2016

**EXHIBIT A – THE POTTS LAW FIRM**

<b>CIVIL ACTION NUMBER</b> (listed numerically in ascending order)	<b>CASE NAME</b>
2:12-CV-01982	Michele Kelley and Dennis Kelley v. Ethicon, Inc., Johnson & Johnson, and American Medical Systems, Inc.
2:13-CV-26443	Nadine Maciejewski v. Johnson & Johnson, American Medical Systems, Inc., Ethicon, Inc.
2:13-CV-31012	Dianna Abreu v. Johnson & Johnson, American Medical Systems, Inc., Ethicon, Inc.
2:14-CV-07225	Dawn Pagan, Michael Pagan v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-CV-07518	Maria Pugliese, Carlos A. Pugliese v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

**CERTIFICATE OF SERVICE**

I hereby certify that on April 18, 2016, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in these member cases.

/s/ Barbara R. Binis